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CHINA NORTH EAST PETROLEUM
HOLDINGS LIMITED, WANG HUNG JUN,
GUIZHI JU, ZHANG YANG

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**In re China North East Petroleum
Holdings Limited Securities Litigation**

No. 10-CV-04577 (MGC) (THK)
ECF Case

CLASS ACTION

THIS DOCUMENT RELATES TO:

All Actions

**SUPPLEMENTAL DECLARATION OF MICHAEL J. COFFINO IN SUPPORT OF
MOTION TO DISMISS THE CONSOLIDATED CLASS ACTION COMPLAINT**

SUPPLEMENTAL DECLARATION OF MICHAEL J. COFFINO

I, Michael J. Coffino, hereby declare as follows:

1. I am an attorney at law, licensed to practice before each of the District and State Courts of the State of California and admitted to appear and participate *pro hac vice* in the this action. I am a member in the law firm of The Crone Law Group, counsel of record for China North East Petroleum Holdings Limited (the “Company”), Wang Hung Jun, Guizhi Ju, and Zhang Yang (collectively, “Defendants”) in this action. I make this supplemental declaration in support of Defendants’ Motion to Dismiss the Consolidated Class Action Complaint. If called upon to do so, I could and would testify competently to the matters set forth in this declaration.

2. Attached to this declaration as Exhibit 29 is a true and correct copy of China North East Petroleum Holdings Limited Form 8-K filed with the SEC on August 12, 2010, as obtained by my office from the SEC’s EDGAR service.

3. Attached to this declaration as Exhibit 30 is a true and correct copy of pertinent pages of China North East Petroleum Holdings Limited Schedule 14A Information Statement filed with the SEC on November 19, 2010, as obtained by my office from the SEC’s EDGAR service.

4. Attached to this declaration as Exhibit 31 is a true and correct copy of China North East Petroleum Holdings Limited Form 8-K filed with the SEC on November 24, 2009, as obtained by my office from the SEC’s EDGAR service.

5. Attached to this declaration as Exhibit 32 is a true and correct copy of the daily performance of China North East Petroleum Holdings Limited Stock, the Standard & Poor’s 600 Oil & Gas Index (EXP IDXX), and the Dow Jones U.S. Oil & Gas Index, from January 2, 2008 to April 6, 2011 as obtained by my office from Bloomberg Finance L.P.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief and this declaration was executed on April 11, 2011 at San Francisco, California.

/s/ Michael J. Coffino

Michael J. Coffino